

MICHAEL IAN GAREY/Bar#50565
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Attorney for Defendant
Isaias Ruiz-Rodriguez

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA)CASE NO.
)2:18-cr-00087-JCM-PAL
Plaintiff,)
v.)MOTION FOR PREPARATION
)OF PRE-PLEA REPORT AS
)TO CRIMINAL HISTORY;
ISAIAS RUIZ-RODRIGUEZ,)DECLARATION; PROPOSED
)ORDER
)
Defendant.)

TO THE CLERK OF THE ABOVE-ENTITLED COURT, AND TO THE
UNITED STATES ATTORNEY FOR THE DISTRICT OF NEVADA,
ATTN: ASSISTANT UNITED STATES ATTORNEY SUSAN CUSHMAN:

Defendant Isaias Ruiz-Rodriguez, through
counsel, hereby moves the Court for an order for the
preparation of a pre-plea report limited to the issue
of criminal history. This motion is based on the
attached declaration of counsel, and it is believed

that the Government does not oppose this motion.

Dated: May 16, 2018

Respectfully Submitted,

_____/S/_____

Michael Ian Garey
Attorney for Defendant
Isaias Ruiz-Rodriguez

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No.:
)	2:18-cr-00087-JCM-PAL
Plaintiff,)	
)	DECLARATION OF MICHAEL IAN
v.)	GAREY
)	
ISAIAS RUIZ-RODRIGUEZ,)	
)	
Defendant.)	
_____)	

I, Michael Ian Garey do hereby declare and state:

1. I am an attorney duly licensed in the State of California, and have been approved to appear as defense counsel for Defendant Isaias Ruiz-Rodriguez, *pro hac vice* in this matter;
2. Preliminary discussions re possible resolution of

this matter have begun, and an assessment of the Defendant's criminal history would be of assistance in confirming that he is "safety valve" eligible, pursuant to the provisions of U.S.S.G. section 5C1.2 and 18 U.S.C. 3553(f);

3. I have spoken to A.U.S.A. Susan Cushman, and believe that this motion is unopposed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed at Santa Ana, California this 16th day of May, 2018.


____/S/_____

Michael Ian Garey

ORDER

It is hereby ordered that the Probation Department shall prepare a pre-plea report in this matter, limited to the issue of criminal history.

Dated: May 22, 2018


Peggy A. Leen
United States Magistrate Judge